

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Thomas J. Tucker

---

**CERTIFICATION OF NO RESPONSE OR OBJECTION REGARDING  
CITY OF DETROIT’S MOTION TO ENFORCE ORDER, PURSUANT TO  
SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND  
BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES  
FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND  
MANNER OF NOTICE THEREOF AGAINST DORETHA MASON,  
NORTHLAND RADIOLOGY, INC. AND AMERICAN ANESTHESIA  
ASSOCIATES, LLC**

On January 26, 2016, the City Of Detroit (“City”) filed its Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Doretha Mason, Northland Radiology, Inc. and American Anesthesia Associates, LLC (“Motion”). [Doc. No. 10737]. The Motion was served upon counsel via first class mail and electronic mail on the same date, as follows:

Counsel to Doretha Mason:

Carl Collins  
Law Office of Carl Collins III PLC  
20755 Greenfield Rd., Ste. 1100  
Southfield, MI 48075  
[carlcollins3@attycarlcollins.com](mailto:carlcollins3@attycarlcollins.com)

Counsel to America Anesthesia Associates, LLC

Gerald Paulovich  
Anthony Litigation, PLLC  
2000 Town Center, Ste. 1900  
Southfield, MI 48075  
[gp@anthonylitigation.com](mailto:gp@anthonylitigation.com)

Counsel to Northland Radiology, Inc.

Lukasz Wietrzynski  
Buckfire & Buckfire, P.C.  
25800 Northwestern Highway, Ste. 890  
Southfield, MI 48075  
[luke@buckfirelaw.com](mailto:luke@buckfirelaw.com)

*See Certificate of Service* Exhibit A.

No response or objection to the Motion has been filed with the Court and the time to do so has passed. The City respectfully requests that the Court enter an order in substantially the same form as the one which was attached to the Motion.

*See Proposed Order* Exhibit B.

MILLER, CANFIELD, PADDOCK AND  
STONE, P.L.C.

By: /s/ Marc N. Swanson  
Jonathan S. Green (P33140)  
Marc N. Swanson (P71149)  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

- and -

CITY OF DETROIT LAW DEPARTMENT

Charles N. Raimi (P29746)  
James Nosedá (P52563)  
2 Woodward Avenue, Suite 500  
Detroit, Michigan 48226  
Phone – (313) 237-5037/(313)  
Email – [raimic@detroitmi.gov](mailto:raimic@detroitmi.gov)

Attorneys for the City of Detroit

DATED: February 15, 2016

## **Exhibit A**

**EXHIBIT 4 – CERTIFICATE OF SERVICE**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

The undersigned hereby certifies that on January 26, 2016, he served a copy of the foregoing **CITY OF DETROIT'S MOTION TO ENFORCE ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c), ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST DORETHA MASON, NORTHLAND RADIOLOGY, INC. AND AMERICAN ANESTHESIA ASSOCIATES, LLC** upon the persons listed below via first class mail and email:

Counsel to Doretha Mason:

Carl Collins  
Law Office of Carl Collins III PLC  
20755 Greenfield Rd., Ste. 1100  
Southfield, MI 48075  
carlcollins3@attycarlcollins.com

Counsel to America Anesthesia Associates, LLC

Gerald Paulovich  
Anthony Litigation, PLLC  
2000 Town Center, Ste. 1900  
Southfield, MI 48075  
gp@anthonylitigation.com

Counsel to Northland Radiology, Inc.

Lukasz Wietrzynski  
Buckfire & Buckfire, P.C.  
25800 Northwestern Highway, Ste. 890  
Southfield, MI 48075  
luke@buckfirelaw.com

DATED: January 26, 2016

By: /s/ Marc N. Swanson

Marc N. Swanson (P71149)  
150 West Jefferson, Suite 2500  
Detroit, Michigan 48226  
Telephone: (313) 496-7591  
Facsimile: (313) 496-8451  
[swansonm@millercanfield.com](mailto:swansonm@millercanfield.com)

## **Exhibit B**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Honorable Thomas J. Tucker

Chapter 9

**ORDER GRANTING CITY OF DETROIT'S MOTION TO ENFORCE  
ORDER, PURSUANT TO SECTIONS 105, 501, AND 503 OF THE  
BANKRUPTCY CODE AND BANKRUPTCY RULES 2002 AND 3003(c),  
ESTABLISHING BAR DATES FOR FILING PROOFS OF CLAIM AND  
APPROVING FORM AND MANNER OF NOTICE THEREOF AGAINST  
DORETHA MASON, NORTHLAND RADIOLOGY, INC. AND AMERICAN  
ANESTHESIA ASSOCIATES, LLC**

This matter, having come before the Court on the Motion to Enforce Order, Pursuant to Sections 105, 501, and 503 of the Bankruptcy Code and Bankruptcy Rules 2002 and 3003(c), Establishing Bar Dates for Filing of Proofs of Claim and Approving Form and Manner of Notice Thereof against Doretha Mason, Northland Radiology, Inc. and American Anesthesia Associates, LLC ("Motion")<sup>1</sup>, upon proper notice and a hearing, the Court being fully advised in the premises, and there being good cause to grant the relief requested,

**THE COURT ORDERS THAT:**

1. The Motion is granted.

---

<sup>1</sup> Capitalized terms used but not otherwise defined in this Order shall have the meanings given to them in the Motion.



2. Within five days of the entry of this Order, Doretha Mason, Northland Radiology, Inc. and American Anesthesia Associates, LLC will dismiss, or cause to be dismissed, with prejudice the lawsuit captioned as Doretha Mason, Plaintiff, Northland Radiology, Inc., Intervening Plaintiff, American Anesthesia Associates, LLC, Proposed Intervening Plaintiff vs. City of Detroit, Defendant, case number 14-0001808, filed in the Wayne County Circuit Court.

3. Doretha Mason, Northland Radiology, Inc. and American Anesthesia Associates, LLC are permanently barred, estopped and enjoined from asserting the claims arising from or related to their State Court Actions against the City of Detroit or property of the City of Detroit.

4. The Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.